

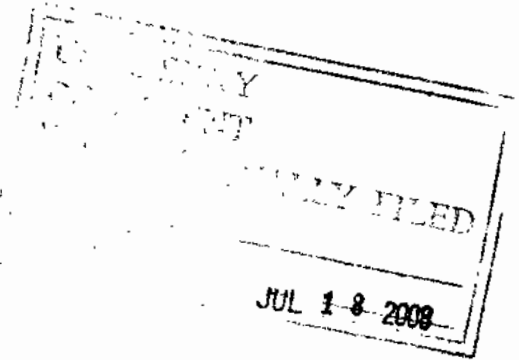
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ADMITTED IN NEW YORK



July 16, 2008

**BY TELEFAX**

(212) 805-6737

Honorable George B. Daniels  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 630  
New York, NY 10007

**SO ORDERED**

The conference is adjourned to  
October 22, 2008 at 9:30 a.m.

*George B. Daniels*  
**HON. GEORGE B. DANIELS**

JUL 18 2008

Re: Fireman's Fund Ins. Co. v. M/V Gulf Service et al.  
07 Civ. 11283 (GBD)  
Our File: 2617001

Dear Judge Daniels:

We represent defendants Hornbeck Offshore Transportation, LLC and Hornbeck Offshore Services, LLC ("Hornbeck") in the above captioned maritime collision case. We write on behalf of both plaintiffs and defendants regarding the status of this case, as requested by your chambers, and to seek an extension of the present discovery deadline.

The parties have narrowed the issues in dispute and are at present focusing primarily on the extent of the plaintiff's damages (Plaintiff is claiming physical damage to its vessel involved in the collision as well as lost profits allegedly sustained following the collision). Defendants recently deposed a representative of plaintiff's company as to the quantum of the company's damages, both in regard to the physical damage as well as the company's lost profits. Following the deposition, defendants served additional discovery requests on the plaintiff requesting production of specific items which the witness testified substantiated the company's loss of use claim. Defendants are now presently awaiting production of these documents, which will either substantiate or refute plaintiff's allegations. Once produced, the parties should be in a position to discuss settlement.

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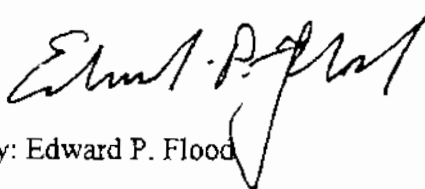
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The present discovery deadline is August 11, 2008. However, the above-mentioned outstanding discovery has only been recently served and the parties respectfully request that the discovery deadline be extended an additional forty-five (45) days, up to and including September 16, 2008. Although this is the parties' second request, the parties believe that this additional time will be needed to complete all of the necessary discovery. Assuming the Court grants this request, the parties also respectfully request that the date for the submission of the Pre-Trial Order be extended one (1) month, to October 16, 2008 and that the Final Pre-Trial Conference be adjourned to a date thereafter.

We thank Your Honor for consideration of this joint application.

Respectfully,

Lyons & Flood, LLP



By: Edward P. Flood

**VIA E-MAIL**

**ggb@caseybarnett.com**

cc: Gregory G. Barnett, Esq.  
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